

## **EXHIBIT 12**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST  
DOMESTIC VIOLENCE, *et al.*

*Plaintiffs,*

v.

PAMELA BONDI, in her official capacity as United  
States Attorney General, *et al.*

*Defendants.*

Case No. 1:25-cv-00279

**DECLARATION OF MONIQUE MINKENS**

I, Monique Minkens, declare as follows:

**I. Background**

1. I am the Executive Director of End Domestic Abuse Wisconsin: the Wisconsin Coalition Against Domestic Violence (“End Domestic Abuse WI” or “Coalition”), which is Wisconsin’s federally designated domestic violence coalition.

2. End Domestic Abuse WI was founded in 1985 and is headquartered in Madison, Wisconsin. The Coalition works to create social change to end domestic violence by supporting and centering survivors, advocating for systemic and legislative change, and strengthening the capacity of domestic violence service providers across the state of Wisconsin. The Coalition provides its members with individualized training and technical assistance opportunities, access to support and resources, and invitations to coalition-hosted events.

3. Although End Domestic Abuse WI does not provide direct services, it includes a direct services provider, the RISE Law Center, that would not exist if it were not under the umbrella of the Coalition. In addition, the Coalition staffs a phone line that is frequently called

by survivors, and the Coalition provides technical assistance and connections to local domestic violence programs to those survivors.

4. End Domestic Abuse WI has an annual budget of \$6.08 million. Of that total amount, roughly \$1.95 million comes from Office on Violence Against Women (OVW) grants and another \$700,700 from other funds flowing from federal grants or contracts.

## **II. End Domestic Abuse WI Member Organizations**

5. End Domestic Abuse WI is a statewide coalition of anti-violence Program Members, Allied Partners, and Supporting Members working in partnership to address the root causes of violence, create a safer world, and end domestic violence. All Coalition members must agree to adhere to the mission, vision, and values of End Domestic Abuse WI. *See* <https://www.endabusewi.org/mission-vision-values/>. Any Wisconsin domestic violence program or program with work related to domestic violence is eligible to apply to be a Program Member in the Coalition. Although Wisconsin domestic violence programs are not required to join End Domestic Abuse WI, the Coalition must have at least half of the state's domestic violence programs as members to qualify as the State's federally designated domestic violence coalition, as it has done. Non-profit organizations and government agencies whose work intersects with, but is not primarily focused on, the issues of domestic violence and interpersonal violence are eligible to apply to be Allied Partners of the Coalition. Any individual who supports the Coalition's mission, vision, and values may apply to be a Supporting Individual Member of the Coalition.

6. The Coalition's membership includes a member that is being identified for purposes of this lawsuit as "Coalition Member Doe 1," which has a mission to support and bring healing to survivors and their families while working with the community to recognize and

prevent abuse; and a member that is being identified for purposes of this lawsuit as “Coalition Member Doe 2,” which provides services to reach out to those affected by sexual assault and domestic abuse, provides support to those in crisis, and educates individuals, families, and the community to empower them to live lives free of domestic abuse and sexual assault.

7. The Coalition also includes two projects, RISE Law Center and National Clearinghouse on Abuse in Later Life (NCALL), that would not exist if they were not under the umbrella of the Coalition, as they do not have their own tax status.

### **III. Grants for Which the Coalition Has or Has Intended to Apply**

8. End Domestic Abuse WI has applied for and received a formula grant from OVW for the State and Territory Domestic Violence and Sexual Assault Coalitions Program (“Coalition Grant”) every year since at least 2007, and upon information and belief, beginning in 1999.

9. Most recently, OVW awarded End Domestic Abuse WI a total of \$114,574 through the Coalition Grant in FY24. The grant has a period of performance and a budget period of October 1, 2024 through September 30, 2025.

10. End Domestic Abuse WI has used Coalition Grant funds to maintain and expand its robust legal training and technical assistance, ensuring continued support for advocates and the survivors they serve. For example, over the years, the Coalition has offered a wide range of legal trainings, including recent offerings such as “Introduction to Legal Advocacy,” developed in response to the high turnover of legal advocates during the pandemic and subsequent federal funding cuts, “Immigration Options for Survivors,” which highlights VAWA protections for underserved survivors, and specialized topics like “Trauma, Mental Health, and Substance Abuse.” In addition, the Coalition conducts an annual homicide report, detailing the individual

cases of domestic violence homicide in Wisconsin and highlighting precipitating factors along with demographic data, and the Coalition frequently uses Coalition Grant funds to support the preparation of this homicide report.

11. End Domestic Abuse WI receives competitive grants from OVW as well.

Currently, End Domestic Abuse WI has the following OVW grants:

- a. The OVW FY22 Training and Technical Assistance Grant, for the period October 1, 2022 through September 30, 2025;
- b. The OVW FY22 Legal Assistance for Victims (LAV) Grant, for the period October 1, 2022 through September 30, 2025; and
- c. The OVW Rural Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (Rural Program Grant), for the period October 1, 2022 through September 30, 2025.

12. Additionally, End Domestic Abuse WI currently receives funds through the OVW Stages Pathway Program, as a subgrantee of the grantee organization Futures Without Violence, for the period July 2024 to September 2026.

13. For the upcoming OVW grant cycle (October 1, 2025 through September 30, 2026), End Domestic Abuse WI has applied for the FY25 Coalition Grant. If awarded the Coalition Grant, as expected, End Domestic Abuse WI would receive \$114,574. The Notice of Funding Opportunity (NOFO) for the Coalition Grant requires applicants to submit a certification by June 23, 2025 at 11:59 PM ET and submit the final application by June 25, 2025 at 8:59 PM ET.<sup>1</sup> If awarded this Grant, the Coalition would be able to continue to maintain and

---

<sup>1</sup> Pursuant to a stipulation filed in this matter, End Abuse WI and its members are not required to submit a certification for any OVW grant until August 12. Absent judicial relief, we will be required to submit a certification at that time.

expand its robust legal training and technical assistance, ensuring continued support for advocates and the survivors they serve. The Coalition would further be able to continue producing an annual homicide report. However, if End Domestic Abuse WI could not obtain the Coalition Grant, it would have to terminate up to three staff members, thus interfering with its ability to continue providing the same level of training options and services, and either find alternate sources of funding for its legal training or risk discontinuing the same level of legal training.

14. Already, due to the challenged conditions, End Domestic Abuse WI was deterred from applying for funding through the OVW Rural Program, for which the Coalition has successfully applied and been awarded in the past.

**IV. Grants for Which the Coalition's Members Currently Have or Have Intended to Apply**

15. Members of End Domestic Abuse WI have also received OVW grants, including grants under the OVW Services, Training, Officers, and Prosecutors (STOP) Formula Grant Program, and the OVW Sexual Assault Services (SASP) Formula Grant Program.

16. In addition, the National Clearinghouse on Abuse in Later Life (NCALL), a project within the Coalition, receives OVW funding through the Training and Technical Assistant Initiative and, as a subgrantee of the organization Futures Without Violence, through the Strategies to Enhance Greater Elder Safety (STAGES) program.

17. Various Coalition members have also intended to apply for OVW grants this year.

18. For example, Coalition Member Doe 1 intends to apply for OVW funding through the Children and Youth Grant Program, and the OVW Transitional Housing Assistance Grants Program. The NOFO for the Children and Youth Grant requires applicants to submit a

certification by June 30, 2025 at 11:59 PM ET and submit the final application by July 2, 2025 at 8:59 PM ET.

19. Coalition Member Doe 2 intends to apply for OVW funding through the Children and Youth Grant Program, the OVW Improving Criminal Justices Response (ICJR) Program, and the Engaging Men Grant Program. The NOFO for the Engaging Men Grant requires applicants to submit a certification by June 30, 2025 at 11:59 PM ET and submit the final application by July 2, 2025 at 8:59 PM ET.

#### **V. OVW's New Funding Conditions**

20. The Notices of Funding Opportunity (NOFOs) for the FY25 OVW grants for which the Coalition and its members have intended to apply include new “out-of-scope” funding conditions that differ significantly from the conditions imposed on the use of federal funds under the same grant awards for prior fiscal years. Specifically, the NOFOs for the FY25 OVW grants prohibit grant funds from being used for: (1) promoting or facilitating the violation of federal immigration law; (2) inculcating or promoting gender ideology; (3) promoting or facilitating discriminatory programs or ideology, including illegal DEI and “diversity, equity, inclusion, and accessibility” programs that do not advance the policy of equal dignity and respect; (4) activities that frame domestic violence or sexual assault as systemic social justice issues rather than criminal offenses; (5) programs that discourage collaboration with law enforcement or oppose or limit the role of police, prosecutors, or immigration enforcement in addressing violence against women; (6) awareness campaigns or media that do not lead to tangible improvements in prevention, victim safety, or offender accountability; (7) initiatives that prioritize illegal aliens over U.S. citizens and legal residents in receiving victim services and support; and (8) any activity or program that unlawfully violates an Executive Order. In addition to identifying these

activities as “out-of-scope activities” for which grant funds may not be used, the NOFOs for the FY25 OVW grants require applicants to submit a certification with their application saying that they will not use the grant funds on the “out-of-scope” activities.

21. In addition, OVW has updated the General Terms and Conditions applicable to its grants and cooperative agreements for fiscal year 2025 to require a separate certification as a term of each award. The term requires a grant recipient to agree that “its compliance with all applicable federal civil rights and nondiscrimination laws is material to the government’s decision to make th[e] award and any payment thereunder, including for purposes of the False Claims Act.” The term further states that “by accepting the award,” the grantee “certifies that it does not operate any programs,” including DEI programs, “that violate any applicable federal civil rights nondiscrimination laws.”

## **VI. OVW’s New Funding Conditions Place the Coalition and its Members in an Untenable Position**

22. The new funding conditions present End Domestic Abuse WI and its members with an impossible choice. The Coalition could forgo applying for OVW grants and face the direct consequences to the Coalition’s financial health and ongoing operations. Or the Coalition may apply and jeopardize its mission and compliance with VAWA requirements, and face enormous risks of litigation and government investigations under the False Claims Act no matter what the Coalition does.

23. Agreeing to the certifications would cause End Domestic Abuse WI profound harm. The funding conditions are vague, and several could be read to conflict with the Coalition’s core mission and the activities it has undertaken for decades in furtherance of that mission and in reliance on OVW grants. The funding conditions may require the Coalition to cease engaging in activities that it had previously understood OVW grants to plainly support.

Thus, the Coalition does not know how it may comply with the funding conditions while also staying true to its mission and providing essential support for member organizations, advocates, and vulnerable victims and survivors of domestic abuse and sexual violence.

24. For instance, the Coalition’s mission is to “promote social change that transforms societal attitudes, practices, and policies to prevent and eliminate domestic violence, abuse and oppression.” Furthermore, one of the Coalition’s key values is “social justice and change,” which it explains includes “an intersectional approach in understanding and addressing the root causes of racial, gendered, economic, and all other forms of oppression in the fight for equity and to end abuse.” The Coalition is unsure whether it may undertake its day-to-day activities reflecting its mission and values without running afoul of the condition not to “promot[e] or facilitat[e] discriminatory programs or ideology, including illegal DEI” as DOJ might interpret those terms. It is also unclear whether the Coalition’s mission and values, which explicitly include “social justice and change”, violate the anti-social justice part of the certification, and whether the Coalition could comply with the anti-social justice condition without adopting a view antithetical to its true beliefs.

25. Many of the Coalition’s activities in furtherance of its OVW grant-funded direct service programs may also conflict with the new funding conditions. The Coalition considers part of its role to be educating programs and the wider community about the dynamics of domestic violence. In the view of the Coalition, such education necessarily includes a recognition of the structural and cultural factors that perpetuate violence, silence survivors, and limit access to safety—especially for women, LGBTQ+ people, and other marginalized genders. In its training and public education work, the Coalition frequently frames domestic violence as an issue of social justice, because doing so prioritizes the safety of all victims. Relatedly, the

Coalition's training and public education includes information about what victims with the most barriers need to attain freedom from violence, and typically includes information, based on the findings of its own homicide report, research by the U.S. Centers for Disease Control and Prevention (CDC), and a Columbia University study of homicides between 2019 and 2020, establishing that Black women and girls are the victims facing the most barriers to safety in Wisconsin. Indeed, inspired in part by research findings that Black women aged 25 to 44 in Wisconsin are 20 times more likely to die by homicide than white women in the same age group, a Missing Murdered Indigenous Family Member task force was created in the state – a factor that the Coalition considers to be a public acknowledgment of the existence of the problem and of the inextricable connections between race and gender-based violence in Wisconsin. Yet the Coalition is unsure if it may address these realities in its training and public education work while complying with the funding conditions not to “promot[e] or facilitat[e] discriminatory programs or ideology, including illegal DEI” or ““inculcat[e] or promot[e] gender ideology,” as DOJ might interpret those terms.

26. Additionally, Coalition member Doe 1 would have to fundamentally change its programming or accept new grants and risk running afoul of various funding conditions imposed on those grants. For Coalition member Doe 1, providing trauma-informed, inclusive care to all survivors—including LGBTQI+ individuals and those who are transgender or nonbinary—is essential to its mission to support and bring healing and safety for survivors and their families. Excluding or ignoring aspects of a survivor’s identity, such as gender identity, would cause harm and reduce the effectiveness of its services. Coalition member Doe 1 therefore believes that, while the OVW certifications may prohibit the use of certain grant funds in ways that align with

its current practices, Coalition member Doe 1 cannot and will not alter its programming in a way that compromises its core purpose or the dignity and care of those it serves.

27. The Coalition fears that if it agrees to the new funding conditions, it could face not only the loss of grant funds, but federal government investigation, private party litigation under the False Claims Act, and potential liability for not complying. These potential consequences of seeking a grant subject to the new, vague conditions make the Coalition concerned about applying or accepting an award. To mitigate these risks, the Coalition would have to change its practices, in many cases contrary to its core values.

28. Not agreeing to the certifications would result in equally grave harm.

29. Not having access to funds from the Coalition Grant and other competitive grants would severely undermine the Coalition's ability to function as a state coalition and to provide direct services. Losing the Coalition Grant alone would result in a \$114,574 loss of funds for the next fiscal year. The combined loss of funds from all OVW grants on which the Coalition relies would represent a substantial loss of \$1.95 million, roughly one third of its entire annual budget. Without these funds, the Coalition would have to reduce the size of its staff and frequency and scope of its training, therefore, its services to members.

30. Our member programs would lose access to core, comprehensive training for their staff necessary to provide legally and ethically compliant advocacy services to clients in addition to regular training on emergent issues that ensure front-line staff are able to provide quality services to all survivors. The state would lose critical technical assistance in systemic response improvements that reduce domestic violence, increase effectiveness of legal responses, and dramatically improve survivor response and support efforts. These losses would make End

Domestic Abuse WI less effective as a coalition and undermine its role as the state authority on sexual violence prevention, intervention, and response.

**VII. Cuts to the Coalition's and its Members' Services Would Harm Domestic Violence Victims and Survivors**

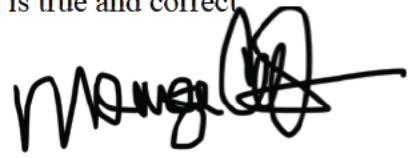
31. The reduction or outright termination of these services would have devastating effects on the community of survivors and victims of domestic violence.

32. In the absence of fully funded End Domestic Abuse WI services, domestic violence victims will be confronted with more barriers when trying to access services following the harm they've experienced, including discriminatory treatment from medical, law enforcement or courtroom personnel, hotline operators, and therapists who have not received anti-bias and other core victim services training. This will immediately lead to more survivors choosing not to participate in the criminal justice system and fewer being linked to and receiving appropriate medical and therapy services. Direct service providers will be unable to maintain high quality services that follow best practice guidance or even that are fully compliant with the myriad federal, state, and local requirements they would now have to navigate on their own, without the critical assistance of coalitions, while desperately trying to keep up with the already increasing demand for services.

33. The Coalition's operations are essential to permitting the network of direct service providers to focus on providing the highest-quality services to the survivors they serve and ensuring that the systems that contribute to addressing and responding to the epidemic of domestic violence are operating with evidence-based, trauma-informed, survivor-centered policies and practices.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2025.



---

Monique Minkens  
Executive Director  
End Domestic Abuse Wisconsin